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16 **UNITED STATES DISTRICT COURT**
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18 **NORTHERN DISTRICT OF CALIFORNIA**
19
20 **SAN FRANCISCO DIVISION**

21 IN RE: UBER TECHNOLOGIES, INC.,
22 PASSENGER SEXUAL ASSAULT
23 LITIGATION

Case No. 3:23-md-03084-CRB

24 **LEVIN SIMES PLAINTIFFS’**
25 **OPPOSITION TO DEFENDANTS UBER**
26 **TECHNOLOGIES, INC., RASIER, LLC,**
27 **AND RASIER-CA, LLC’S MOTION TO**
28 **DISMISS CASES FOR FAILURE TO**
COMPLY WITH AMENDED PTO 10

This Document Relates to:

Jane Doe LS 618 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-06160-CRB

Jane Doe LS 619 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-06243-CRB

Jane Doe LS 620 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-06249-CRB

Jane Doe LS 621 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-06297-CRB

Jane Doe LS 622 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-06306-CRB

Jane Doe LS 625 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-06539-CRB

Jane Doe LS 626 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-06541-CRB

Judge: Honorable Charles R. Breyer
Date: January 16, 2026
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

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1 *Jane Doe LS 627 v. Uber Technologies, Inc., et*
2 *al., Case No. 3:25-cv-06547-CRB*

3 *Jane Doe LS 628 v. Uber Technologies, Inc., et*
4 *al., Case No. 3:25-cv-06552-CRB*

5 *Jane Doe LS 630 v. Uber Technologies Inc., et*
6 *al., Case No. 3:25-cv-06861-CRB*

7 *Jane Doe LS 633 v. Uber Technologies, Inc., et*
8 *al., Case No. 3:25-cv-07285-CRB*

9 *Jane Doe LS 634 v. Uber Technologies, Inc., et*
10 *al., Case No. 3:25-cv-07323-CRB*

11 *Jane Doe LS 639 v. Uber Technologies, Inc., et*
12 *al., Case No. 3:25-cv-07616-CRB*

13 *Jane Doe LS 640 v. Uber Technologies, Inc., et*
14 *al., Case No. 3:25-cv-07628-CRB*

15 *Jane Doe LS 641 v. Uber Technologies, Inc., et*
16 *al., Case No. 3:25-cv-07844-CRB*

17 *Jane Doe LS 642 v. Uber Technologies, Inc., et*
18 *al., Case No. 3:25-cv-07894-CRB*

19 *John Doe LS 15 v. Uber Technologies, Inc., et*
20 *al., Case No. 3:25-cv-07862-CRB*

1 **I. INTRODUCTION**

2 Uber wrongly presents this issue as one of refusal by the clients to fill out a Plaintiff Fact
3 Sheet, as if they were unwilling to comply with the Court's Orders. However, this is not the case.
4 The clients are not unwilling; our firm has been unsuccessful in obtaining current contact
5 information in order to reach them to comply with this Court's orders. We acknowledge and
6 understand that under PTO 10, the court created procedures and deadlines to produce a PFS. Our
7 firm is, and has been, employing all of the resources available to us outside of the original contact
8 information in an effort to obtain the necessary information.

9 There are many reasons why these victims of sexual assault could be unresponsive after
10 having their case stayed for many years. These cases often involve young women who are mobile
11 – changes in address name, phone number, etc. are all real human reasons why their initial contact
12 information is no longer valid. Our office has employed extensive efforts to reach these plaintiffs.
13 Those efforts predate the filing of Uber's motion.

14 **II. ARGUMENT**

15 There are a few clients that should be excluded from Uber's motion:

- 16 • Jane Doe LS 641's PFS was produced on 10/10/2025.
- 17 • We believe Jane Doe 619 is currently incarcerated.
- 18 • We believe Jane Doe LS 626 is also currently incarcerated.
- 19 • We have also been in contact with Jane Doe LS 639, and believe that she will
20 submit her PFS shortly.

21 With respect to the remaining named clients, we have worked diligently to reach the above
22 name plaintiffs. These efforts include numerous phone calls, emails, texts, written letters, and
23 address searches. (Bokaie Dec., at ¶ 4.) We also employed investigators to trace new contact
24 information. (Bokaie Dec., at ¶ 4.) Simply put, while we have made every effort to reach these
25 Plaintiffs to complete a Plaintiff Fact Sheet, we have not received any indication that these clients
26 are actually aware that they have failed to comply with the Court's orders.

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CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Samira J. Bokaie
Samira J. Bokaie

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